COM/CAP/avs **Agenda ID# 13781**

Decision _____

**BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

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| Order Instituting Rulemaking Pursuant to Assembly Bill 2514 to Consider the Adoption of Procurement Targets for Viable and Cost-Effective Energy Storage Systems | Rulemaking 10-12-007<br>(Filed December 16, 2010) |

# DECISION GRANTING COMPENSATION TO THE GREEN POWER INSTITUTE FOR SUBSTANTIAL CONTRIBUTION TO DECISIONS (D.) 12-08-016 AND 13-10-040

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| **Claimant: The Green Power Institute** | **For contribution to D.12-08-016 and D.13-10-040** |
| **Claimed: $73,671.00** | **Awarded: $73,669.50** |
| **Assigned Commissioner: Carla Peterman** | **Assigned ALJs: Amy C. Yip-Kikugawa and Colette Kersten** |

## PART I: PROCEDURAL ISSUES

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| **A. Brief Description of Decision:** | Decision (D.) 12-08-016: Adopted energy storage framework staff proposal for analyzing energy storage needs, concluded Phase 1 and commenced Phase 2.<br>Decision (D.) 13-10-040: Established policies and mechanisms for procurement of electric storage pursuant to Assembly Bill 2514. |

**B. Claimant must satisfy intervenor compensation requirements set forth in Public Utilities Code §§ 1801-1812:**

| | Claimant | CPUC Verified |
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| **Timely filing of notice of intent to claim compensation (NOI) (§ 1804(a)):** | | |
| 1. Date of Prehearing Conference: | April 21, 2011 | Verified |
| 2. Other Specified Date for NOI: | | |
| 3. Date NOI Filed: | May 13, 2011 | Verified |
| 4. Was the NOI timely filed? | | Yes |
| **Showing of customer or customer-related status (§ 1802(b)):** | | |
| 5. Based on ALJ ruling issued in proceeding number: | R.10-12-007 | Verified |
| 6. Date of ALJ ruling: | July 5, 2011 | Verified |
| 7. Based on another CPUC determination (specify): | | |
| 8. Has the Claimant demonstrated customer or customer-related status? | | Yes |
| **Showing of "significant financial hardship" (§ 1802(g)):** | | |
| 9. Based on ALJ ruling issued in proceeding number: | R.10-12-007 | Verified |
| 10. Date of ALJ ruling: | July 5, 2011 | Verified |
| 11. Based on another CPUC determination (specify): | | |
| 12. Has the Claimant demonstrated significant financial hardship? | | Yes |
| **Timely request for compensation (§ 1804(c)):** | | |
| 13. Identify Final Decision: | D.13-10-040 | Verified |
| 14. Date of Issuance of Final Order or Decision: | October 21, 2013 | Verified |
| 15. File date of compensation request: | December 16, 2013 | Verified |
| 16. Was the request for compensation timely? | | Yes |

## PART II: SUBSTANTIAL CONTRIBUTION

**A. In the fields below, describe in a concise manner Claimant's contribution to the final decision (*see* § 1802(i), § 1803(a) & D.98-04-059).**

| Intervenor's Claimed Contribution(s) | Specific References to Intervenor's Claimed Contribution(s) | CPUC Discussion |
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| **D.12-08-016, Framework for Analyzing Energy Storage** | (Please note that Attachment 2 includes a list of GPI Pleadings relevant to this Claim.) | |
| 1. **Identify Applications, Define Use Cases**<br><br>The GPI emphasized from our earliest filing in this proceeding that storage is fundamentally different than generation, and that the framework for analyzing and supporting the deployment of storage should also be different.<br><br>Due to the fact that storage represents a broad range of technologies with a wide variety of capabilities, and the early stage of commercialization that is characteristic of most storage technologies, the GPI supported the proposal for an application-based framework to be used for the second phase of the proceeding. | GPI's *Comments on Barriers to Storage*, 8/29/11, pgs. 1-4.<br><br>On pg. 1 of the GPI's *Comments*, we argued: "Indeed, storage is a family of technologies with a variety of characteristics that can provide a range of different kinds of services for the state's integrated electricity grid. Dealing with the diversity of systems that come under the rubric of storage, while recognizing that the field is still in rapid development, suggests to us that the best approach, from a regulatory perspective, is to make sure that there is sufficient flexibility in the framework to accommodate and promote new technologies and applications."<br><br>On pg. 26, the Decision states: "The multi-functional capabilities of energy storage mean that this resource cannot be evaluated and considered on a "one size fits all" basis. As such, we believe that there is a need to divide energy storage applications into separate, discrete functions."<br><br>The Decision acknowledges, on page 8, the GPI's contribution to developing a broad framework for the analysis of energy storage systems in this proceeding based on an application-driven approach. The Decision adopts a framework based on the application-driven approach, and presents 20 applications, or use cases, for | Verified |

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| | consideration in the second phase of the proceeding.<br>GPI's *Comments on the PD*, 7/23/12, pgs. 1-2.<br>The staff proposal that is adopted in the Decision presents 20 use cases for storage, several of which are based on using storage for purposes of renewables integration. Our *Comments* helped the Commission to distinguish the types of approaches to integration that storage can provide, and argued for putting use cases providing integration services in the highest priority category. | |
| 2. **Identify Barriers to Storage**<br>One of the first efforts undertaken in this proceeding was the identification of barriers to the deployment of storage systems in California.<br>In this context, the GPI identified the lack of storage-specific tariffs as a major barrier to the early deployment of storage. The GPI also identified the lack of a cohesive regulatory framework designed specifically for the diverse storage sector, and the lack of commercial operating experience as major barriers to the deployment of storage. | GPI's *Comments on Barriers to Storage*, 8/29/11, pgs. 2-4.<br>The GPI identified and discussed the following barriers in these *Comments*:<br>• Need for storage-specific tariffs<br>• The application-specific approach has merit<br>• Setting targets for storage<br>• Storage, renewables, and RECs<br>• Using the storage in plug-in vehicles for grid operations<br>• Ownership and the operation of storage<br>GPI's *Comments on the PD*, 7/23/12, pgs. 1-2.<br>Our *Comments* discuss and highlight the use cases that are relevant to the integration of renewables, and the barriers they face.<br>The Decision discusses nine barriers to the deployment of storage in California, including several that the GPI brought to the Commission's attention. In particular, we contributed to the | Verified |

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| | discussion and understanding of the following barriers: lack of a cohesive regulatory framework, lack of cost transparency and price signals, and lack of commercial operating experience. | |
| **D.13-10-040, Energy Storage Procurement Framework** | | |
| 3. **Use Cases, Targets for Storage**<br><br>AB 2514 directs the Commission to consider setting targets for storage systems. This was one of the most contentious issues settled in this Decision. The GPI argued that if targets for storage systems were adopted, they should be broad and encompassing in terms of the kinds of storage systems that qualify for the targets, and any targets that are set should be based on installed MW, not contracted-for MW, as was the case in the original proposal for instituting targets. We also pointed out that in the original proposal the overall procurement targets were being conflated with the allocations reserved for the proposed biennial solicitations, resulting in confusion.<br><br>The final Decision makes clear that storage systems that are procured outside of the solicitations ordered in this Decision can be eligible for satisfying storage targets, that targets can only be met by operating capacity, not contracted-for capacity, that capacity procured in a given | GPI's *Comments on the Phase 2 Interim Staff Report*, 2/4/13, pgs. 7-8.<br><br>We concluded our discussion of targets on page 8 with: "It might make sense to set reasonable, near-term program goals for a defined set of promising applications for storage systems, probably based on the Use Cases. This would send a clear signal to the marketplace that significant growth in energy-storage systems in California is on the horizon."<br><br>GPI's *Reply Comments on the Phase 2 Interim Staff Report*, 2/21/13, pgs. 2-3.<br><br>On page 3, we refuted the argument of many parties opposed to setting targets for storage on the basis that storage should compete on its own in the competitive marketplace: "Simply allowing storage to compete in the electricity marketplace for the provision of goods and services is not appropriate at this point in time for this promising set of technologies that are still in the early stages of commercialization.<br><br>GPI's *Comments on the AC's Ruling Proposing Storage Procurement Targets*, 7/3/13, pgs. 4-5.<br><br>We argue in favor of the proposed storage targets on pg. 5: "We support the setting of overall procurement targets for storage installations that can be fulfilled by a wide variety of storage configurations that contribute to the | Verified |

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| solicitation needs several years to move from winning bid to commissioned facility, and the Decision distinguishes between the overall targets that are set for storage, and the allocations that are reserved for the biennial solicitations. | state's interconnected electrical system, including installations that are integrated with renewable generators, installations that are integrated into operations of various portions of the grid, and installations that are on the customer side of the meter or otherwise operated on behalf of the interests of electricity consumers."<br><br>We also argue that the proposal conflates overall targets with allocations for individual solicitations, and that fulfilling targets should require operating capacity, not contracts for projects-in-development: "The GPI also notes that the proposal uses the term procurement targets, as they are applied to the proposed solicitations, to refer to the amounts of storage capacity that should be awarded contracts in the various solicitations described in the proposal. The RPS program and other preferred-resources programs overseen by this Commission have long established the precedent that procurement targets refer to delivered energy or services, not contracted-for energy or services. We strongly urge the Commission to set storage-procurement targets that can only be fulfilled with operating storage capacity, not with contracted-for capacity, some of which will never materialize." [Comments, pg. 5.]<br><br>GPI's *Reply Comments on the AC's Ruling Proposing Storage Procurement Targets*, 7/19/13, pgs. 1-2.<br><br>In our Reply, we reiterated our support for broad-based procurement targets, and for targets that could only be fulfilled with operating capacity, not contracted-for capacity.<br><br>GPI's *Comments on the Proposed Decision of Commissioner Peterman*, | |

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| | 9/23/13, pgs. 1-3, 5-6. We recognized progress made since the original proposal in clarifying the difference between allocations to solicitations and overall targets, but asked for a couple of further clarifications. For example, we pointed out: "Moreover, there is an inevitable time lag between when a contract is signed, and when a project is operational. Thus, for example, contracts that result from solicitations conducted in 2020 will surely not contribute any online operating capacity in-service by 2020. The PD and the Framework are silent on the issue of time lag between contract award and operational installation." [Comments, pg. 2.]<br><br>We also expressed our concern that the PD offered insufficient direction to the utilities regarding the design of the their solicitations: "We encourage the Commission to insert language into the final Decision that encourages the utilities to design a series of solicitations to meet the procurement goals in each entry in the Storage Framework Table. For example, the solicitation for a utility-owned and operated installation would be quite different than the solicitation for a third-party-owned and operated installation. In many cases it might be more effective for a utility to use a series of limited solicitations to meet each target in the Framework's Table, rather than a single, broader solicitation." [Comments, pg. 6.]<br><br>The final Decision establishes a flexible series of targets and solicitations for storage systems. The Decision makes it clear that targets must be met with operating installations, and accounts for the lag time between contracting and operations: "However, by no later than the end of 2024, the IOUs must have the | |

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| | full 1,325 MW installed. … Thus, we are balancing flexibility in roughly the next decade with an absolute installation requirement no later than the end of 2024." [D.13-10-040, pg. 26.] | |
| 4. **Define Eligibility Rules for Storage Targets**<br><br>The June 10, 2013, proposal for instituting targets for storage systems described a proposed solicitation system for storage, but also made a number of existing storage projects that are in various stages of development eligible for satisfying the targets. The GPI encouraged the Commission to be inclusive, and urged the Commission to set explicit rules for determining the eligibility of storage systems procured outside of the sanctioned storage solicitations.<br><br>The GPI introduced the concept into the proceeding that in addition to stationary storage installations, under appropriate circumstances the batteries in plugin electric vehicles should be eligible for the targets. We also supported excluding large pumped hydro from meeting the targets, for reasons that are roughly analogous to the reasons for excluding large hydro from participating in the RPS program.<br><br>The final Decision takes our advice and sets explicit eligibility rules for participation in the targets. | GPI's *Comments on the Phase 2 Interim Staff Report*, 2/4/13, pgs. 4-5.<br><br>In these Comments the GPI criticized the EV charging use case, which required commercial chargers to have fixed storage installations in order to be eligible for the targets, and described how, under the appropriate circumstances the batteries in the vehicles being charged can be used to provide storage-operating services to the grid without the need for any fixed storage installation.<br><br>GPI's *Comments on the Proposed Decision of Commissioner Peterman*, 9/23/13, pgs. 4-5.<br><br>In these Comments we support the PD for including a process for qualifying non-listed projects that do not arise from a storage solicitation, and encourage the Commission to include a definition of eligibility in the final Decision. For example, on pg. 4 we argue: "In the opinion of the GPI, the Commission would be wise to incorporate into the Framework a clear and explicit definition or statement about what kinds of storage systems are eligible to fulfill the Framework's procurement targets."<br><br>We also support the PD's determination to exclude pumped hydro projects larger than 50 MW from eligibility for the storage targets set in this proceeding, and encourage the Commission to include the batteries in plugin vehicles as eligible under specified conditions: "The PD and the Storage Framework are | Verified |

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| Vehicle batteries are determined to be eligible under appropriate conditions, and large pumped hydro is not eligible. | silent on the subject of the energy-storage capacity that is growing in the nascent plug-in vehicle fleet. Much of this storage capacity will be operated (charged and discharged) beyond the control and/or use of the electricity grid, and in our opinion this capacity should not be eligible for the Storage Framework targets. On the other hand, some amount of the storage capacity that is embodied in the vehicle fleet could be put under the control of grid operators for purposes of providing grid-operating services, for example by employing smart meters and commercial charging operations, and in our opinion the storage capacity in this category ought to be considered for eligibility for the Framework's targets." [Comments, pgs. 4-5.]<br><br>The Decision provides, on pg. 32, precise eligibility rules for determining what kinds of storage are eligible for meeting the storage targets set in the Decision:<br><br>"Based on the definitions accepted under the use cases and Section 2835(a), we find that all of the storage projects identified in the Proposed Plan should be counted towards the IOUs' procurement targets provided that they meet the following requirements:<br><br>1. The project demonstrates its ability to meet one or more of the following purposes: grid optimization, integration of renewable energy, or reduction of greenhouse gas emissions.<br><br>2. The project is under contract or was installed after January 1, 2010.<br><br>3. The project is operational by no later than the end of 2024.<br><br>Other IOU storage projects that were not identified in the Proposed Plan, such as | |

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| | PG&E's Vaca-Dixon Battery Project and Yerba Buena Battery Project, should also count towards the IOU's procurement targets once they have reached commercial operation and meet the three requirements above."<br><br>The Decision also determines that large pumped hydro projects are ineligible for the targets, and batteries in EVs could be eligible: "Similarly, energy storage capacity that could be obtained from plug-in vehicles and programs/systems that utilize electric vehicles for grid services (Vehicle to Grid) could count towards procurement targets." [D.13-10-040, pg. 32.] | |
| 5. **Add Storage to the Loading Order?**<br><br>The January 18, 2013, ALJ's Ruling Requesting Comments asks whether storage should be designated a preferred resource and added to the state's loading order. The GPI argued that based on technical merit a case could be made that storage could be added to the loading order. However, we warned that adding storage to the loading order can only be done via a joint decision of the agencies that are parties to the original determination, not unilaterally by the PUC. We further pointed out that going through the process would be lengthy, and so adding storage to the loading order would not assist near-term efforts to facilitate its deployment.<br><br>The final Decision agrees with | GPI's *Comments on the Phase 2 Interim Staff Report*, 2/4/13, pgs. 5-6.<br><br>In these Comments the GPI argued that it would be appropriate to make storage a preferred resource and add it to the loading order, but only if done with due process: "We believe that the only way to fully, or officially, insert storage into the loading order would be to do so using the same joint-agency process as has been used in the past to establish and update the state's *Energy Action Plan*." We also pointed out that this would be a lengthy process, and thus not relevant to anything undertaken in this proceeding.<br><br>GPI's *Reply Comments on the Phase 2 Interim Staff Report*, 2/21/13, pg. 2.<br><br>In these Reply Comments we reiterate our warning that amending the state loading order would be a lengthy process, and would not help in the near-term commercialization of storage systems. Nevertheless, we supported the pursuit of an exploratory process to | Verified |

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| us that designating storage as a preferred resource and adding it to the loading order would require a multiagency action, and is not needed for purposes of implementing AB 2514. | determine whether it is worth pursuing the process.<br><br>The Decision, on pgs. 10-11, acknowledges that storage is worthy of designation as a preferred resource, but declines to revise the loading order unilaterally. | |
| 6. **Limits on Utility Ownership of Storage**<br><br>The GPI argued, from the beginning of the proceeding, that storage is different than generation, and that rules limiting utility ownership of generation are not necessarily needed in the case of storage. Moreover, insofar as storage is sited and used for providing grid-operating services, there is reason to believe that the optimal mode of operating these systems may be most easily obtained when they are owned and/or operated by the operators of the grid.<br><br>The June 10, 2013, AC's Ruling proposed strict limits on utility ownership, limiting it to 50 percent in all categories. The final Decision takes our advice and softens the 50 percent limit by broadening it across categories. This should have the effect of allowing utility-ownership of storage for most applications for which this makes sense. | GPI's *Comments on Barriers to Storage*, 8/29/11, pg. 4.<br><br>In our earliest pleading in this proceeding, we introduced, on page 4, the concept that certain kinds of storage systems might benefit from utility ownership: "In the olden days of vertically-integrated utilities, grid operators had their hands, so to speak, on the throttles of their own power plants, and could respond to grid imbalances directly with their own equipment. Today, grid operators respond to schedule deviations and imbalances with contracts for support services with service providers. We would like to put forth the idea that grid operators, including the CAISO and the major distribution utilities, consider investing in, owning and operating strategic storage systems that are designed to provide rapid-response services to the grid."<br><br>GPI's *Comments on the Phase 2 Interim Staff Report*, 2/4/13, pgs. 2-3.<br><br>In these Comments we argue that ownership models can influence how storage systems are operated, and that transmission-connected storage systems owned and operated by the grid operator could be optimized compared to operations of these systems by third parties operating subject to rigid contract provisions: "If grid operators had direct operational control over | Verified |

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| | storage systems, we believe that they would be able to derive benefits from the systems that will be difficult to elicit from storage systems that are operating in conventional, generator-oriented markets."<br><br>GPI's *Reply Comments on the Phase 2 Interim Staff Report*, 2/21/13, pg. 3.<br><br>We reiterate our argument about allowing utility ownership of storage installations designed to provide grid operating services.<br><br>GPI's *Comments on the AC's Ruling Proposing Storage Procurement Targets*, 7/3/13, pgs. 3-4.<br><br>In these Comments we oppose the 50 percent limit on utility ownership of storage designed to provide grid operational services that is included in the staff proposal: "In the opinion of the GPI, the same considerations apply to storage systems that are not associated with renewable generators. Many stand-alone storage installations will be designed primarily to supply operating services to grid operators. Due to the newness of these types of installations, it is highly likely that grids equipped with storage systems will take some time in determining how to optimally use these storage systems over a range of operating conditions on the grid. We are concerned that storage facilities that are operated subject to limited and rigid contracts may not be able deliver the full range of services that the installations are capable of supplying. For this reason, the GPI believes that for many storage use cases there is a real advantage to linking the ownership and operations of the storage systems to the grid they serve." [Comments, pgs. 3-4.]<br><br>GPI's *Reply Comments on the AC's Ruling Proposing Storage Procurement* | |

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| | *Targets*, 7/19/13, pgs. 3-4.<br><br>We reiterate, in this Reply, our support for allowing utility ownership of storage installations, to the extent that utilities want to do so. We conclude our argument on pg. 4 with: "We are not in any way arguing against providing for the development of non-utility (private) ownership and operation of storage systems of all varieties. We are simply arguing against imposing limitations on utility ownership."<br><br>The Decision, on pgs. 48-52, retains an overall limitation of 50 percent on utility ownership of storage, but only applies the limitation to each IOU's entire portfolio of storage systems: "In light of the above, we find that the utility ownership of storage projects should not exceed 50 percent of all storage across all three grid domains at this time. In other words, utilities may own no more than half of all of the storage projects they propose to count toward the MW target, regardless of whether it is interconnected at the transmission or distribution level, or on the customer side of the meter." [D.13-10-040, pgs. 51-52.] As late in the process as the PD the 50-percent limitation was applied individually to each of the grid domains. | |
| 7. **Use of RAM-Type Solicitations for Storage**<br><br>The June 10,2013, proposal for instituting targets for storage systems described a proposed solicitation mechanism for storage modeled on the RAM auction system used for mid-sized renewables in the RPS program. The GPI argued that a RAM-type solicitation is not suitable for technologies in the early stages of | GPI's *Comments on the AC's Ruling Proposing Storage Procurement Targets*, 7/3/13, pgs. 6-8.<br><br>We argued, in these Comments, that a RAM-type procurement mechanism was structurally unsuited to the job of promoting the development of this emerging market: "RAM-type solicitations are designed to procure, at lowest cost to the ratepayer, well-defined products from installations that are commercially mature. This does not describe the current state of the storage | Verified |

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| commercialization, and would not work well in a situation in which different potential bidders would be offering differing packages of products and services.<br><br>The final Decision rejects the RAM mechanism for storage, and provides for different kinds of solicitations for different kinds of storage systems. | market, which is not commercially mature, and which is composed of a range of technologies and configurations, each with a unique set of products that it can potentially provide to the grid. We are concerned that a RAM-type solicitation would be far too limiting to stimulate the full range of systems and products that the storage industry is capable of providing." [Comments, pg. 6.]<br><br>GPI's *Reply Comments on the AC's Ruling Proposing Storage Procurement Targets*, 7/19/13, pg. 2.<br><br>We conclude, on pg. 2, our argument opposing the use of the RAM: "We continue to believe that the RAM is not a good fit for storage, which is both in the early stages of commercial development, and composed of too broad a range of products and services to be adequately targeted in a RAM solicitation. We continue to recommend that the Commission consider other procurement mechanisms that may be more suitable for this still emerging market, such as demonstration projects and targeted RFOs."<br><br>The Decision rejects the RAM using our structural argument: "We agree with parties that the RAM is not the appropriate mechanism for the procurement of energy storage. Energy storage has multiple attributes and functions that cross the spectrum of wholesale and retail markets and transmission & distribution grid services. As such, a RAM-type solicitation, which seeks to obtain the lowest cost for ratepayers, may not be able to properly evaluate projects due to the variety of functions and markets served." [D.13-10-040, pgs. 54-55.] | |

**B. Duplication of Effort (§§ 1801.3(f) & 1802.5):**

| | Claimant | CPUC Verified |
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| **a. Was the Office of Ratepayer Advocates (ORA) a party to the proceeding?**[1] | Yes | Yes |
| **b. Were there other parties to the proceeding with positions similar to yours?** | Yes | Yes |
| **c. If so, provide name of other parties:** CA Energy Storage Alliance, CALWEIA, CEERT, Clean Coalition, DRA, IEP, LSA, SEIA, Sierra Club, and the three large IOUs. | | Yes |
| **d. Describe how you coordinated with ORA and other parties to avoid duplication or how your participation supplemented, complemented, or contributed to that of another party:** We listed a dozen parties in c. above who had positions similar to our own. However, it should be noted that we also had positions contrary to all of the listed parties on some issues, even while we agreed on other issues. This proceeding represented the Commission's initial foray into a new area, and traditional alliances among parties were often not applicable. We were in contact with all of the environmental parties participating in the proceeding, shared ideas, and supported each other when our views concurred. The GPI coordinated its efforts in this proceeding with other parties in order to avoid duplication of effort, and thereby added significantly to the outcome of the Commission's deliberations. Some amount of duplication has occurred in this proceeding on all sides of contentious issues, but Green Power avoided duplication to the extent possible, and tried to minimize it where it was unavoidable. | | Coordination efforts do not attribute to issues of duplication of efforts among parties. |

## PART III: REASONABLENESS OF REQUESTED COMPENSATION

**A. General Claim of Reasonableness (§§ 1801 & 1806):**

| **a. Intervenor's claim of cost reasonableness:** | **CPUC Verified** |
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| The GPI is providing, in Attachment 2, a listing of all of the pleadings we provided in this Proceeding, R.10-12-007 that are relevant to matters covered by this Claim, and a detailed breakdown of GPI staff time spent for work performed that was directly related to our substantial contributions to Decisions D.12-08-016, and D.13-10-040.<br><br>The hours claimed herein in support of Decisions D.12-08-016, and D.13-10-040 are reasonable given the scope of the Proceeding, and the strong participation by the GPI. Dr. Morris acted in this Proceeding as both witness and participating | Verified |

[1] The Division of Ratepayer Advocates was renamed the Office of Ratepayer Advocates effective September 26, 2013, pursuant to Senate Bill No. 96 (Budget Act of 2013: public resources), which was approved by the Governor on September 26, 2013.

party. We were also assisted by our capable Associate, Vennessia Whiddon. GPI staff maintained detailed contemporaneous time records indicating the number of hours devoted to this case. In preparing Attachment 2, Dr. Morris reviewed all of the recorded hours devoted to this proceeding, and included only those that were reasonable and contributory to the underlying tasks. As a result, the GPI submits that all of the hours included in the attachment are reasonable, and should be compensated in full.

Dr. Morris is a renewable energy analyst and consultant with more than twenty-five years of diversified experience and accomplishments in the energy and environmental fields. He is a nationally recognized expert on biomass and renewable energy, climate change and greenhouse-gas emissions analysis, integrated resources planning, and analysis of the environmental impacts of electric power generation. Dr. Morris holds a BA in Natural Science from the University of Pennsylvania, an MSc in Biochemistry from the University of Toronto, and a PhD in Energy and Resources from the University of California, Berkeley.

Dr. Morris has been actively involved in electric utility restructuring in California throughout the past two decades. He served as editor and facilitator for the Renewables Working Group to the California Public Utilities Commission in 1996 during the original restructuring effort, consultant to the CEC Renewables Program Committee, consultant to the Governor's Office of Planning and Research on renewable energy policy during the energy crisis years, and has provided expert testimony in a variety of regulatory and legislative proceedings, as well as in civil litigation.

Ms. Whiddon is a highly capable professional in the early stages of her career. Ms. Whiddon has a Masters from Towson University, and is working in the renewable energy field. Ms. Whiddon worked for 5 years for Washington Counsel / Ernst and Young, a Washington, D.C. based consulting and lobbying firm, and is now working on her own, including as an associate of the Green Power Institute.

Decision D.98-04-059 states, on pgs. 33-34, "Participation must be productive in the sense that the costs of participation should bear a reasonable relationship to the benefits realized through such participation. … At a minimum, when the benefits are intangible, the customer should present information sufficient to justify a Commission finding that the overall benefits of a customer's participation will exceed a customer's costs." This proceeding was concerned with preparing the way to the commercialization of a new set of technologies, collectively called storage, that have the potential to revolutionize the way the integrated electricity grid is operated. If successful, the efforts that have begun in this proceeding have the potential to save ratepayers millions of dollars annually in terms of reduced costs of grid operations, and to do so without any incremental emissions of greenhouse gases. These cost reductions overwhelm the cost of our participation in this proceeding.

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| **b. Reasonableness of Hours Claimed.**<br><br>The GPI made Significant Contributions to Decisions D.12-08-016, and D.13-10-040 by participating in working groups, and providing a series of Commission filings on the various topics that were under consideration in the Proceeding, and are covered by this Claim. Attachment 2 provides a detailed breakdown of the hours that were expended in making our Contributions. The hourly rates and costs claimed are reasonable and consistent with awards to other intervenors with comparable experience and expertise. The Commission should grant the GPI's claim in its entirety. | Verified |
| **c. Allocation of Hours by Issue**<br><br>1. Identify applications (use cases), develop storage-specific targets 14%<br>2. Identify barriers to the development / deployment of storage 10%<br>3. Setting targets for storage 38%<br>4. Define eligibility rules for storage targets 11%<br>5. Change the loading order to include storage 6%<br>6. Limits on utility ownership of storage 14%<br>7. Use of the RAM for the solicitation of storage installations 7% | |

**B. Specific Claim:***

| CLAIMED | | | | | | CPUC AWARD | | |
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| **ATTORNEY, EXPERT, AND ADVOCATE FEES** | | | | | | | | |
| **Item** | **Year** | **Hours** | **Rate $** | **Basis for Rate*** | **Total $** | **Hours** | **Rate $** | **Total $** |
| G. Morris | 2011 | 58.0 | $240 | D.11-07-025 | $13,920.00 | 58 | $240 | $13,920.00 |
| G. Morris | 2012 | 49.5 | $245 | D.13-05-009 | $12,128.00 | 49.5 | $245 | $12,127.50 |
| G. Morris | 2013 | 175.0 | $250 | *See* comment 1 | $43,750.00 | 175 | $250[2] | $43,750.00 |
| V. Whiddon | 2011 | 9.75 | $70 | D.13-05-009 | $683.00 | 9.75 | $70 | $682.50 |
| V. Whiddon | 2013 | 15.5 | $75 | *See* comment 2 | $1,163.00 | 15.5 | $75[3] | $1,162.50 |
| | | | | | ***Subtotal:* $71,644.00** | | | ***Subtotal:* $71,642.50** |

[2] Application of the 2% Cost-of-Living Adjustment approved in Resolution ALJ-287.

[3] Application of the 2% Cost-of-Living Adjustment approved in Resolution ALJ-287.

| INTERVENOR COMPENSATION CLAIM PREPARATION ** | | | | | | | | |
|---|---|---|---|---|---|---|---|---|
| **Item** | **Year** | **Hours** | **Rate $** | **Basis for Rate*** | **Total $** | **Hours** | **Rate** | **Total $** |
| G. Morris | 2013 | 16 | $125 | ½ rate for 2013 | $2,000.00 | 16 | $125 | $2,000.00 |
| | | | | | ***Subtotal:* $2,000.00** | | | ***Subtotal:* $2,000.00** |

| COSTS | | | | |
|---|---|---|---|---|
| **#** | **Item** | **Detail** | **Amount** | **Amount** |
| | Postage | See attachment 2 | $27.00 | $27.00 |
| | | | ***Subtotal:* $27.00** | ***Subtotal:* $27.00** |
| | | | **TOTAL REQUEST: $73,671.00** | **TOTAL AWARD: $73,669.50** |

* We remind all intervenors that Commission staff may audit their records related to the award and that intervenors must make and retain adequate accounting and other documentation to support all claims for intervenor compensation. Intervenor's records should identify specific issues for which it seeks compensation, the actual time spent by each employee or consultant, the applicable hourly rates, fees paid to consultants and any other costs for which compensation was claimed. The records pertaining to an award of compensation shall be retained for at least three years from the date of the final decision making the award.

** Reasonable claim preparation time typically compensated at ½ of preparer's normal hourly rate.

| ATTORNEY INFORMATION |
|---|
| *No attorneys were used in the performance of the services covered by this Request.* |

### C. Attachments Documenting Specific Claim and Comments on Part III

| Attachment or Comment # | Description/Comment |
|---|---|
| Comment 1 | Res. ALJ-287 provides for a 2013 COLA of 2% over 2012 rates, resulting in a 2013 rate of $250/hr (rounded to the nearest five, per D.13-05-009) |
| Comment 2 | Res. ALJ-281 provides for a 2012 COLA of 2.2% over 2011 rates, and Res. ALJ-287 provides for a 2013 COLA of 2% over 2012 rates, resulting in a 2013 rate of $75/hr (rounded to the nearest five, per D.13-05-009) |
| Attachment 1 | **Certificate of Service** |

## PART IV: OPPOSITIONS AND COMMENTS

| | |
|---|---|
| **A. Opposition: Did any party oppose the Claim?** | No |

| | |
|---|---|
| **B. Comment Period: Was the 30-day comment period waived (*see* Rule 14.6(2)(6))?** | Yes |

## FINDINGS OF FACT

1. Green Power Institute has made a substantial contribution to D.12-08-016 and D.13-10-040.
2. The requested hourly rates for Green Power Institute's representatives are comparable to market rates paid to experts and advocates having comparable training and experience and offering similar services.
3. The claimed costs and expenses are reasonable and commensurate with the work performed.
4. The total of reasonable compensation is $73,669.50.

## CONCLUSION OF LAW

1. The Claim, with any adjustment set forth above satisfies all requirements of Public Utilities Code §§ 1801-1812.

## ORDER

1. The Green Power Institute is awarded $73,669.50.
2. Within 30 days of the effective date of this decision, Pacific Gas and Electric Company, Southern California Edison Company and San Diego Gas & Electric Company shall pay the Green Power Institute their respective shares of the award based on their California-jurisdictional electric revenues for the 2012 calendar year, to reflect the year in which the proceeding was primarily litigated. Payment of the award shall include compound interest at the rate earned on prime, three-month non-financial commercial paper as reported in Federal Reserve Statistical Release H.15, beginning March 1, 2014, the 75th day after the filing of Green Power Institute's request, and continuing until full payment is made.

3. The comment period for today's decision is waived.

This decision is effective today.

Dated _____, at San Francisco, California.

# APPENDIX

## Compensation Decision Summary Information

| | | | |
|---|---|---|---|
| **Compensation Decision:** | | **Modifies Decision?** | |
| **Contribution Decision(s):** | D1208016 and D1310040 | | |
| **Proceeding(s):** | R1012007 | | |
| **Author:** | ALJ Yip-Kikugawa and ALJ Kersten | | |
| **Payer(s):** | Pacific Gas and Electric Company, Southern California Edison Company, and San Diego Gas & Electric Company | | |

## Intervenor Information

| Intervenor | Claim Date | Amount Requested | Amount Awarded | Multiplier? | Reason Change/Disallowance |
|---|---|---|---|---|---|
| Green Power Institute | 12/16/2013 | $73,671.00 | $73,669.00 | N/A | N/A |

## Advocate Information

| First Name | Last Name | Type | Intervenor | Hourly Fee Requested | Year Hourly Fee Requested | Hourly Fee Adopted |
|---|---|---|---|---|---|---|
| Gregory | Morris | Expert | Green Power Institute | $240 | 2011 | $240 |
| Gregory | Morris | Expert | Green Power Institute | $245 | 2012 | $245 |
| Gregory | Morris | Expert | Green Power Institute | $250 | 2013 | $250 |
| Vennessia | Whiddon | Analyst | Green Power Institute | $70 | 2011 | $70 |
| Vennessia | Whiddon | Analyst | Green Power Institute | $75 | 2013 | $75 |

**(END OF APPENDIX)**